

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

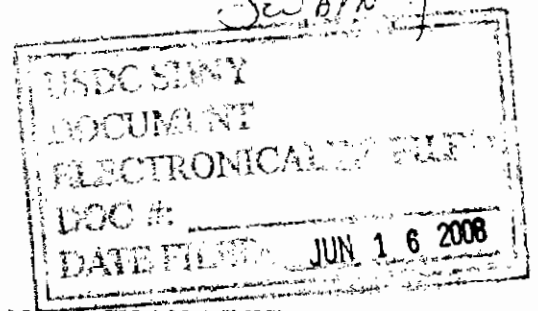
LHB INSURANCE BROKERAGE INC., on behalf of
itself and all others similarly situated,

Plaintiff,

v.

CITIGROUP INC. and CITIGROUP GLOBAL
MARKETS INC.,

Defendants.



Case No. 08-CV-3095 (LTS)

JUDGE LAURA T. SWAIN

STIPULATION AND
[PROPOSED] ORDER

WHEREAS, Plaintiff in the above-captioned action alleges claims arising out of the same facts and circumstances as plaintiffs in certain other actions pending before this Court;

WHEREAS, the complaint in the above-captioned action is governed by the provisions of the Private Securities Litigation Reform Act ("PSLRA");

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties herein, that:

(a) Paul, Weiss, Rifkind, Wharton & Garrison LLP is authorized to accept on behalf of Defendants, and they hereby do accept, service of the summons and complaint in this action without prejudice;

(b) Defendants do not waive any defenses, objections or arguments except as to sufficiency of service of process;

(c) Defendants shall not be required to answer or otherwise respond to, and are hereby expressly relieved from answering or otherwise responding to, the complaint in the above-captioned action;

(d) Plaintiff shall have 60 days from the entry of the order pursuant to the PSLRA appointing Lead Plaintiff(s) and Lead Counsel to file a consolidated amended complaint (the "Complaint");

(e) Defendants' last day to move, answer or otherwise respond shall be extended to and including the date 60 days after the filing of the Complaint;

(f) in the event any of the Defendants move to dismiss the Complaint:

1. Plaintiff shall have 60 days from the date such motion is served to serve opposition papers; and

2. Defendants shall have 30 days from the date opposition papers are served by Plaintiff to serve reply papers.

Dated: June 11, 2008
New York, New York

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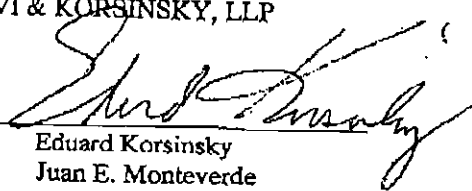
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LEVI & KORSINSKY

PAGE 10/10

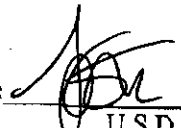
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SO ORDERED:

 6/16/08
U.S.D.J.